

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**COMMONWEALTH OF PUERTO RICO,
et al.,**

Defendants.

CIVIL NO.: 12-cv-02039

MOTION REQUESTING EXTENSION OF TIME TO SUBMIT TRAINING PLAN

MAY IT PLEASE THE COURT:

COME NOW, Codefendants Commonwealth of Puerto Rico and the Puerto Rico Police Bureau (“PRPB”), through the undersigned attorneys, and very respectfully state and pray:

1. On August 22, 2022, the Honorable Court visited PRPB’s Academy in Gurabo, Puerto Rico, for an on-site inspection. The Court entertained a very productive discussion regarding the status and needs of the Academy. During the conversation, the Commonwealth advanced to the Court and the parties that, during the following day’s status hearing, it was going to formally request the opportunity to present a comprehensive training plan in a period of sixty (60) days. The implementation plan would bring sustainable compliance to all training requirements contained in the Consent Decree in this case.

2. During the August 23, 2022 status hearing, the Commonwealth indeed formally presented to the Court its training plan request. After discussion from all parties, the Honorable Court granted the Commonwealth’s request to file the plan in sixty (60) days, or on or before

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October 22, 2022. The Honorable Court requested that the plan include two important elements: first a definitive plan to reconcile Act No. 65 of 2021 and related current or future regulations with paragraph 105 of the Consent Decree; and second the consolidation of all training programs for all bureaus assigned to the Department of Public Safety (“DPS”) in the Gurabo Academy.

3. Since the August 23rd status hearing, the Commonwealth have met various times to organize and form the project team to prepare an outline and first draft of the plan. The team includes a project manager, members of DSP and members of PRPB (including members of the current Academy). The team has held various meetings and already have a rough first draft of the plan.

4. The Commonwealth invited all parties and Court Officers in the case for a virtual conference to discuss recommendations and pertinent matters in connection with the training plan. The conference took place on Wednesday, September 7, 2022, and all parties and Court officers provided useful advice and recommendations that the Commonwealth is taking into consideration.

5. Training is a cornerstone to guarantee public safety, to promote constitutional policing practices, and to fortify the trust of the community in the Police Bureau. To that end, the training plan will include the required initiatives and an implementation plan to achieve them. Among the initiatives that will be detailed in the plan are: a permanent curriculum review committee, a professional career development program, an update of the Police Training Management System, a pre-service training program, a in-service training program, a specialized units training program, and the integration or consolidation of the Academy.

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6. After carefully considering the magnitude of the plan, and the wide array of factors involved, the Commonwealth has come to the realization that the original sixty (60) day period requested will be insufficient to complete the plan. The Commonwealth in good faith believes that a final additional period of sixty (60) day will suffice to submit the draft of the plan to the parties for review and comments.

7. The Commonwealth plans to continue to integrate the USDOJ, the Monitor and the Special Master to the development process of the plan, and to that effect intends to invite the parties for a second virtual conference for the week of October 17th to 21st.

8. During the recent “paragraph 253 meeting” among all parties in the case, held on Wednesday, October 5, 2022, the Commonwealth advanced to the parties and Court officers that for reasons explained it needed the additional time to further prepare and complete the training plan.

WHEREFORE, Defendants Commonwealth of Puerto Rico and the Puerto Rico Police Bureau respectfully request this Honorable Court to take notice of the above and issue an Order granting a final extension of time of sixty (60) days, until December 22, 2022, to submit the training plan.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

In San Juan, Puerto Rico, this 7th day of October, 2022.

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